

**REMARKS**

This is intended as a full and complete response to the Final Office Action dated December 22, 2004, having a shortened statutory period for response set to expire on March 22, 2005. Claims 1-12, 15-38, and 40-48 remain pending in the application. Please reconsider the claims pending in the application for reasons discussed below.

***Claim Rejections*****35 U.S.C. § 102(a)**

The Examiner rejected claims 1, 37, 38, 47, and 48 as being anticipated by *Blose* (U.S. Pat No. 4,822,081). In response, Applicants have amended claims 1, 37, 38, 47, and 48.

As amended, claim 1 includes similar limitations as claims 2, 3, and 31. Specifically, claim 1 includes the limitation of a coupling arrangement adapted for expansion by a rotary expansion tool, whereby the thread portions define a thread cut in an opposite direction to an intended direction of rotation of the rotary expansion tool and include material properties that facilitate engagement of the threads due to rotary expansion thereof. *Blose* does not disclose a coupling arrangement adapted for expansion by a rotary expansion, whereby the thread portions are configured to facilitate engagement of the threads due to rotary expansion thereof. Rather, *Blose* seems to be silent regarding radial expansion. Thus, *Blose* also does not disclose thread portions configured to facilitate engagement of the threads due to rotary expansion thereof.

As amended, claims 37, 38, and 48 include similar limitations as claims 27-29. Specifically, amended claims 37, 38, and 48 include a limitation of a sealing member made from a material that swells when exposed to a selected fluid. *Blose* does not disclose a sealing member made from a material that swells when exposed to a selected fluid. Rather, *Blose* discloses a standard elastomer ring or metal seal to seal the box and pin members from leakage. (See *Blose*, col. 8, lines 18-22)

Additionally, as amended, claim 47 includes a similar limitation as claim 2. Specifically, amended claim 47 includes a limitation of an undercut groove configured to receive and retain the nose during radial expansion of the first tubular and the second tubular by a rotary expansion tool. *Blose* does not disclose an undercut groove configured to receive and retain the nose during radial expansion of the tubulars. Rather, as discussed above, *Blose* seems to be silent regarding radial expansion.

For the reasons discussed above, *Blose* therefore fails to teach each and every limitation of amended claims 1, 37, 38, 47, and 48 and this failure prevents *Blose* from anticipating amended claims 1, 37, 38, 47, and 48. Applicants submit that amended claims 1, 37, 38, 47, and 48 are in condition for allowance and respectfully requests withdrawal of the § 102(a) rejection of claims 1, 37, 38, 47, and 48. Further, claims 2, 4-18, and 31-32 depend from allowable amended claim 1 and these claims are allowable for at least the same reasons as claim 1.

**35 U.S.C. § 103(a)**

The Examiner rejected claim 1 as being obvious over *Evans* (U.S. Pat. No. 6,409,175) in view of *Blose*. In response, Applicants have amended claim 1.

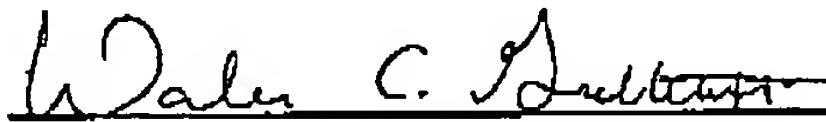
As amended, claim 1 includes the limitation of a coupling arrangement adapted for expansion by a rotary expansion tool, whereby the thread portions define a thread cut in an opposite direction to an intended direction of rotation of the rotary expansion tool and include material properties that facilitate engagement of the threads due to rotary expansion thereof. As set forth above, *Blose* does not disclose a coupling arrangement adapted for expansion by a rotary expansion, whereby the thread portions are configured to facilitate engagement of the threads due to rotary expansion thereof. *Evans* also fails to disclose this limitation. Rather, *Evans* discloses an expansion device (pig P) that does not use rotation to expand the tubular as it is urged through the casing string by hydraulic pressure. (See *Evans*, col. 8, lines 7-18) Thus, *Evans* does not disclose a coupling arrangement adapted for expansion by a rotary expansion, whereby the thread portions are configured to facilitate engagement of the threads due to rotary expansion thereof.

These references, either alone or in combination, therefore fail to teach or suggest all the elements recited in claim 1. This failure precludes *Evans* and/or *Blose* from rendering claim 1 obvious. Applicants therefore respectfully request withdrawal of the § 103(a) rejection of claim 1 and allowance of the same. Further, claims 2-12, 15-29, 31, and 32 depend from allowable amended claim 1 and these claims are allowable for at least the same reasons as claim 1.

### ***Conclusion***

In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed. Having addressed all issues set out in the Final Office Action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



Walter C. Grollitsch

Registration No. 48,678

MOSER, PATTERSON & SHERIDAN, L.L.P.

3040 Post Oak Blvd. Suite 1500

Houston, TX 77056

Telephone: (713) 623-4844

Facsimile: (713) 623-4846

Attorney for Applicants